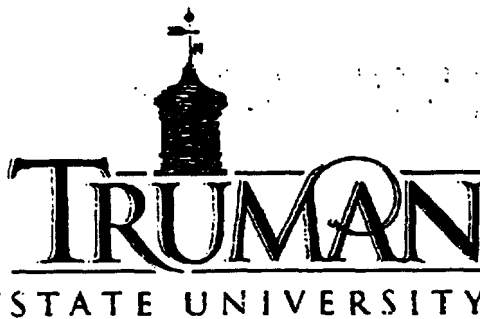


Telephone Services  
(660) 785-4000  
phones@truman.edu



McKinney Center 19  
100 East Normal  
Kirksville, MO 63501-4221

February 9, 2000

Mr. Thomas Sugrue  
Chief Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-C252  
445 Twelfth Street, SW  
Washington, DC 20554

**RECEIVED**

FEB 11 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Thomas Sugrue

Truman State University is a member of ACUTA or The Association of Telecommunications Professionals in Higher Education. The University furnishes telephone service including long distance service for about 750 faculty and staff and over 3,000 on campus students. The billing for this service is based on the SMDR data from the switch. Calling Party Pays (CPP) will cause us a huge financial problem, because there is no way to predict charges from the SMDR with the current proposal. CPP will expose the University to significant financial liability that could seriously undermine our ongoing effort to provide high quality educational services at a reasonable price, because of the very real threat of uncontrollable, unauthorized CPP calls.

The verbal notification is of no value to the university. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. Our system could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls.

As a public non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs, both for the University and our Students. The Commission would best serve the public interest—and accommodate the needs of educational institutions such as ours—by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter.

Sincerely,



Ray Jagger

Director of Telephone Services

Telephone Services  
(660) 785-4000  
phones@truman.edu



McKinney Center 19  
100 East Normal  
Kirksville, MO 63501-4221

February 9, 2000

James D Schlichting  
Deputy Bureau Chief  
Wireless Communications Bureau  
Federal Communications Commission  
Room 3-C254  
445 Twelfth Street, SW  
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Schlichting

Truman State University is a member of ACUTA or The Association of Telecommunications Professionals in Higher Education. The University furnishes telephone service including long distance service for about 750 faculty and staff and over 3,000 on campus students. The billing for this service is based on the SMDR data from the switch. Calling Party Pays (CPP) will cause us a huge financial problem, because there is no way to predict charges from the SMDR with the current proposal. CPP will expose the University to significant financial liability that could seriously undermine our ongoing effort to provide high quality educational services at a reasonable price, because of the very real threat of uncontrollable, unauthorized CPP calls.

The verbal notification is of no value to the university. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. Our system could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls.

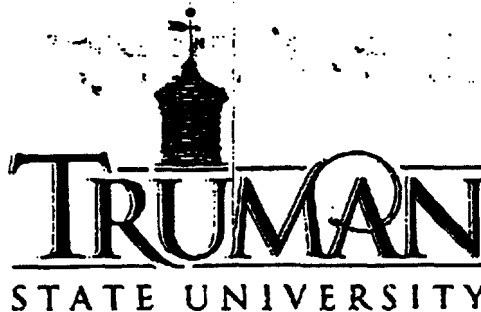
As a public non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs, both for the University and our Students. The Commission would best serve the public interest—and accommodate the needs of educational institutions such as ours—by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter.

Sincerely,

Ray Jagger

Director of Telephone Services

Telephone Services  
(660) 785-4000  
phones@truman.edu



McKinney Center 19  
100 East Normal  
Kirksville, MO 63501-4221

February 9, 2000

Joe Levin  
Wireless Communications Bureau  
Federal Communications Commission  
Room 3-B135  
445 Twelfth Street, SW  
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Levin

Truman State University is a member of ACUTA or The Association of Telecommunications Professionals in Higher Education. The University furnishes telephone service including long distance service for about 750 faculty and staff and over 3,000 on campus students. The billing for this service is based on the SMDR data from the switch. Calling Party Pays (CPP) will cause us a huge financial problem, because there is no way to predict charges from the SMDR with the current proposal. CPP will expose the University to significant financial liability that could seriously undermine our ongoing effort to provide high quality educational services at a reasonable price, because of the very real threat of uncontrollable, unauthorized CPP calls.

The verbal notification is of no value to the university. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. Our system could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls.

As a public non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs, both for the University and our Students. The Commission would best serve the public interest—and accommodate the needs of educational institutions such as ours—by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter.

Sincerely,

Ray Jagger

Director of Telephone Services

Telephone Services  
(660) 785-4000  
phones@truman.edu



McKinney Center 19  
100 East Normal  
Kirksville, MO 63501-4221

February 9, 2000

David Siehl  
Wireless Communications Bureau  
Federal Communications Commission  
Room 3-A164  
445 Twelfth Street, SW  
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Siehl

Truman State University is a member of ACUTA or The Association of Telecommunications Professionals in Higher Education. The University furnishes telephone service including long distance service for about 750 faculty and staff and over 3,000 on campus students. The billing for this service is based on the SMDR data from the switch. Calling Party Pays (CPP) will cause us a huge financial problem, because there is no way to predict charges from the SMDR with the current proposal. CPP will expose the University to significant financial liability that could seriously undermine our ongoing effort to provide high quality educational services at a reasonable price, because of the very real threat of uncontrollable, unauthorized CPP calls.

The verbal notification is of no value to the university. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. Our system could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls.

As a public non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs, both for the University and our Students. The Commission would best serve the public interest—and accommodate the needs of educational institutions such as ours—by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter.

Sincerely,

Ray Jagger

Director of Telephone Services

Telephone Services  
(660) 785-4000  
phones@truman.edu



McKinney Center 19  
100 East Normal  
Kirksville, MO 63501-4221

February 9, 2000

Kris Monteith  
Wireless Communications Bureau  
Federal Communications Commission  
Room 3-C122  
445 Twelfth Street, SW  
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Ms. Monteith

Truman State University is a member of ACUTA or The Association of Telecommunications Professionals in Higher Education. The University furnishes telephone service including long distance service for about 750 faculty and staff and over 3,000 on campus students. The billing for this service is based on the SMDR data from the switch. Calling Party Pays (CPP) will cause us a huge financial problem, because there is no way to predict charges from the SMDR with the current proposal. CPP will expose the University to significant financial liability that could seriously undermine our ongoing effort to provide high quality educational services at a reasonable price, because of the very real threat of uncontrollable, unauthorized CPP calls.

The verbal notification is of no value to the university. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. Our system could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls.

As a public non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs, both for the University and our Students. The Commission would best serve the public interest—and accommodate the needs of educational institutions such as ours—by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter.

Sincerely,

Ray Jagger

Director of Telephone Services

Telephone Services  
(660) 785-4000  
phones@truman.edu



McKinney Center 19  
100 East Normal  
Kirksville, MO 63501-4221

February 9, 2000

Commissioner Gloria Tristani  
Federal Communications Commission  
Room 8-C302  
445 Twelfth Street, SW  
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Commissioner Tristani

Truman State University is a member of ACUTA or The Association of Telecommunications Professionals in Higher Education. The University furnishes telephone service including long distance service for about 750 faculty and staff and over 3,000 on campus students. The billing for this service is based on the SMDR data from the switch. Calling Party Pays (CPP) will cause us a huge financial problem, because there is no way to predict charges from the SMDR with the current proposal. CPP will expose the University to significant financial liability that could seriously undermine our ongoing effort to provide high quality educational services at a reasonable price, because of the very real threat of uncontrollable, unauthorized CPP calls.

The verbal notification is of no value to the university. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. Our system could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls.

As a public non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs, both for the University and our Students. The Commission would best serve the public interest—and accommodate the needs of educational institutions such as ours—by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter.

Sincerely,

Ray Jagger

Director of Telephone Services

Telephone Services  
(660) 785-4000  
phones@truman.edu



McKinney Center 19  
100 East Normal  
Kirksville, MO 63501-4221

February 9, 2000

Commissioner Michael K. Powell  
Federal Communications Commission  
Room 8-A204  
445 Twelfth Street, SW  
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Commissioner Powell

Truman State University is a member of ACUTA or The Association of Telecommunications Professionals in Higher Education. The University furnishes telephone service including long distance service for about 750 faculty and staff and over 3,000 on campus students. The billing for this service is based on the SMDR data from the switch. Calling Party Pays (CPP) will cause us a huge financial problem, because there is no way to predict charges from the SMDR with the current proposal. CPP will expose the University to significant financial liability that could seriously undermine our ongoing effort to provide high quality educational services at a reasonable price, because of the very real threat of uncontrollable, unauthorized CPP calls.

The verbal notification is of no value to the university. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. Our system could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls.

As a public non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs, both for the University and our Students. The Commission would best serve the public interest—and accommodate the needs of educational institutions such as ours—by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter.

Sincerely,

  
Ray Jagger  
Director of Telephone Services

Telephone Services  
(660) 785-4000  
phones@truman.edu



McKinney Center 19  
100 East Normal  
Kirksville, MO 63501-4221

February 9, 2000

Commissioner Furchtgott-Roth  
Federal Communications Commission  
Room 8-A302  
445 Twelfth Street, SW  
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Commissioner Furchtgott-Roth

Truman State University is a member of ACUTA or The Association of Telecommunications Professionals in Higher Education. The University furnishes telephone service including long distance service for about 750 faculty and staff and over 3,000 on campus students. The billing for this service is based on the SMDR data from the switch. Calling Party Pays (CPP) will cause us a huge financial problem, because there is no way to predict charges from the SMDR with the current proposal. CPP will expose the University to significant financial liability that could seriously undermine our ongoing effort to provide high quality educational services at a reasonable price, because of the very real threat of uncontrollable, unauthorized CPP calls.

The verbal notification is of no value to the university. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. Our system could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls.

As a public non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs, both for the University and our Students. The Commission would best serve the public interest—and accommodate the needs of educational institutions such as ours—by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter.

Sincerely,

  
Ray Jagger  
Director of Telephone Services



Telephone Services  
(660) 785-4000  
phones@truman.edu



McKinney Center 19  
100 East Normal  
Kirksville, MO 63501-4221

February 9, 2000

Commissioner Susan Ness  
Federal Communications Commission  
Room 8-B115  
445 Twelfth Street, SW  
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Commissioner Ness

Truman State University is a member of ACUTA or The Association of Telecommunications Professionals in Higher Education. The University furnishes telephone service including long distance service for about 750 faculty and staff and over 3,000 on campus students. The billing for this service is based on the SMDR data from the switch. Calling Party Pays (CPP) will cause us a huge financial problem, because there is no way to predict charges from the SMDR with the current proposal. CPP will expose the University to significant financial liability that could seriously undermine our ongoing effort to provide high quality educational services at a reasonable price, because of the very real threat of uncontrollable, unauthorized CPP calls.

The verbal notification is of no value to the university. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. Our system could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls.

As a public non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs, both for the University and our Students. The Commission would best serve the public interest—and accommodate the needs of educational institutions such as ours—by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter.

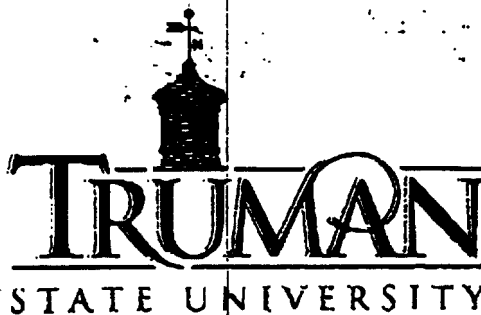
Sincerely,



Ray Jagger

Director of Telephone Services

Telephone Services  
(660) 785-4000  
phones@truman.edu



McKinney Center 19  
100 East Normal  
Kirksville, MO 63501-4221

February 9, 2000

Chairman William E. Kennard  
Federal Communications Commission  
Room 8-B201  
445 Twelfth Street, SW  
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Chairman Kennard

Truman State University is a member of ACUTA or The Association of Telecommunications Professionals in Higher Education. The University furnishes telephone service including long distance service for about 750 faculty and staff and over 3,000 on campus students. The billing for this service is based on the SMDR data from the switch. Calling Party Pays (CPP) will cause us a huge financial problem, because there is no way to predict charges from the SMDR with the current proposal. CPP will expose the University to significant financial liability that could seriously undermine our ongoing effort to provide high quality educational services at a reasonable price, because of the very real threat of uncontrollable, unauthorized CPP calls.

The verbal notification is of no value to the university. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. Our system could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls.

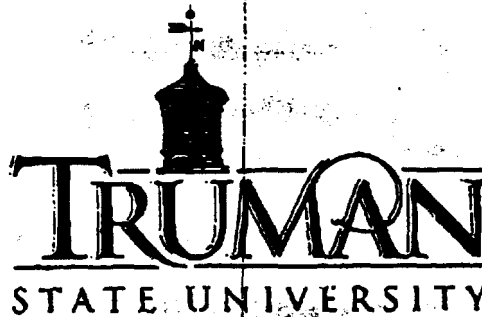
As a public non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs, both for the University and our Students. The Commission would best serve the public interest—and accommodate the needs of educational institutions such as ours—by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter.

Sincerely,

Ray Jagger

Director of Telephone Services

Telephone Services  
(660) 785-4000  
phones@truman.edu



McKinney Center 19  
100 East Normal  
Kirksville, MO 63501-4221

February 9, 2000

Ms. Magalie Roman Salas  
Office of the Secretary  
Federal Communications Commission  
Room TW A324  
445 Twelfth Street, SW  
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Ms. Salas

Truman State University is a member of ACUTA or The Association of Telecommunications Professionals in Higher Education. The University furnishes telephone service including long distance service for about 750 faculty and staff and over 3,000 on campus students. The billing for this service is based on the SMDR data from the switch. Calling Party Pays (CPP) will cause us a huge financial problem, because there is no way to predict charges from the SMDR with the current proposal. CPP will expose the University to significant financial liability that could seriously undermine our ongoing effort to provide high quality educational services at a reasonable price, because of the very real threat of uncontrollable, unauthorized CPP calls.

The Verbal notification is of no value to the university. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. Our system could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls.

As a public non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs, both for the University and our Students. The Commission would best serve the public interest—and accommodate the needs of educational institutions such as ours—by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter.

Sincerely,



Ray Jagger  
Director of Telephone Services